

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. 4:17-cr-00737-1
	§	
KAAN SERCAN DAMLARKAYA	§	

UNOPPOSED MOTION TO CONTINUE SENTENCING
AND TO ENTER A NEW SCHEDULING ORDER

TO THE HONORABLE ANDREW S. HANEN, UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

NOW COMES, Defendant, KAAN SERCAN DAMLARKAYA, in the above-
captioned matter, by and through his undersigned counsel, respectfully moves this
Honorable Court to continue the sentencing and to enter a new scheduling order in his
case and for good cause would show as follows:

I.

Sentencing is currently scheduled on July 13, 2020 at 8:30 a.m.

II.

Counsel for Defendant requests a continuance for the following reasons:

(1) Counsel has not been able to meet with Mr. Damlrakaya since early March
2020. Since mid-March 2020, the COVID-19 pandemic has forced closure for in
person visits at the FDC (Federal Detention Center in Houston). The original order was
to close the facility for thirty (30) days, but the facility has remained closed and likely

will be for the near future.

(2) Counsel and Mr. Damlarkaya need time to meet in person to discuss sentencing and finalize preparation for sentencing. Further, both Counsel and Mr. Damlarkaya request for the sentencing to take place in person, at the courthouse, rather than via Cisco video feed.

III.

Assistant United States Attorney's Alamdar Hamdani and Arthur Jones are unopposed to the continuance.

IV.

This motion for continuance is not made for purposes of delay, but that justice may be done. For all the foregoing reasons, Counsel for Mr. Damlarkaya requests a continuance of the sentencing date for at least one hundred twenty (120) days.

Respectfully submitted,



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Attorney for Defendant,
KAAN SERCAN DAMLARKAYA

CERTIFICATE OF CONFERENCE

Counsel for Mr. Damlarkaya conferred with AUSA's, Alamdar Hamdani and Arthur Jones concerning their position on this Unopposed Motion to Continue Sentencing. They are unopposed.



GARY TABAKMAN

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.



GARY TABAKMAN